

EXHIBIT P

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF ABIDA SHAIKH

I, ABIDA SHAIKH, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship¹.

3. On September 11, 2001, I was present at One World Trade Center on the 63rd floor working for The Port Authority of New York and New Jersey (“Port Authority”) when the terrorist attacks of the World Trade Center Towers occurred. I began my employment with the Port Authority on June 15, 1986 as an accountant. At the time of the attacks, I was employed as an Economic Analyst.

¹ My maiden name was Abida Sultana Khan.

4. I was in New York City at Ground Zero when the plane(s) hit the towers and I received physical injuries in the escape and collapse. When the plane hit, I heard a loud bang and was immediately terrified and rushed to the stairwell with my co-workers. I began the arduous descent down 63 flights of stairs to escape, injuring my back in the process. Once I made it out of the building, I knew I was still not safe. Despite my injured back, I pressed on through the pain and continued to flee until I made it across the Brooklyn Bridge and to safety.

5. As a result of these terrorist attacks, I suffered the following specific injuries on September 11, 2001: Severe lower back pains; lumbar radiculopathy, degenerative disc disease, and herniated nucleus pulposus on the lumbar L4-L5 and L5-S1, as well as left side sciatica.

6. I sought medical attention for my injuries. On September 17, 2001, I was seen by Dr. Shahida M. Abbas for my severe back pain and lumbar strain. I was treated with medication and physical therapy. I attended physical therapy three times a week for six weeks. I was subsequently referred to Dr. Young Hur at Raritan Bay Medical Center and underwent multiple steroid injections to attempt to alleviate the pain. In 2005, I again attempted multiple steroidal injections to ease my pain, this time at Oak Tree Surgery Center. My treatments were not alleviating the severe pain I was experiencing and I began to see a chiropractor. I was a patient of Dr. Ayaz Shah from 2006 through 2012. Dr. Shah advised me to discontinue any activities that would contribute to my pain and prescribed therapeutic exercises. Attached as Exhibit B to this Declaration is a true and correct copy of my medical records related to the treatment that I received following the September 11, 2001 terrorist attacks.

7. My injury has deeply impacted not only myself but also my family. My daily life has been forever altered because of the September 11th attacks. I am very restricted in most activities. I can no longer cook or clean and assist with daily household needs the way I could prior

to my injuries. I am unable to bend over or carry heavy items. This pain alters my mood and negatively impacts my time and enjoyment with my family.

8. I previously pursued a claim (Claim Number VCF00004157) through the September 11th Victim Compensation Fund specifically related to my physical injuries incurred on September 11, 2001, and my claim was determined to be eligible for compensation.

I declare UNDER PENALTY OF PERJURY that the foregoing is true and correct.

EXECUTED on this 30 day of January 2020.


ARIDA SHAIKH

Exhibits Filed Under Seal